

Upper Santa Clara River Watershed EWMP –

Response to Regional Board Comments Received February 9, 2016

Comment Number	Comment	Response
1	Remove Appendix E2 Response to Comments	The appendix is removed, and the response to comments is provided separately from the EWMP.
2	In Table ES-1, 4-8, and Appendix A1 Table A1-14: a. Add nitrogen compounds for SCR Reach 5 as Priority 1. b. Reach 6, priority 2: Add Chlorpyrifos, diazinon, and toxicity for consistency with Table A1-8. c. If above changes are not made, provide clarification/justification.	After discussing this comment with Regional Board staff, footnotes were added to Tables ES-1, 4-8, and A1-14 to explain why the following changes were not made: <ul style="list-style-type: none">Nitrogen compounds for Reach 5 and chlorpyrifos and diazinon for Reach 6 are not prioritized for the because constituents with no exceedances within the past 5 years and WBPCs located in areas where MS4s are not a source contributing to the exceedances (categories 1D, 1E, 2C, 2D, 3C) are not considered to be priorities for the EWMP.Toxicity was not prioritized because other prioritized constituents are expected to address these constituents and other specific constituents contributing to impairments in Category 2B (e.g. toxicity, organic enrichment, etc.) have not been identified and therefore cannot be specifically evaluated in the RAA analysis, and are not prioritized at this time.
3	Correct footnotes (labeled as 7-10) for Appendix A1 Table A1-14 to align with the superscripts (1-4) as in Table ES-1.	The footnotes were corrected.
4	Add Lake Elizabeth Trash TMDL to Table ES-1 and Appendix A1 Table A1-14.	The Trash TMDL was added to Table ES-1 and A1-14.

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5	Revise Table 4-6 to add an “X” for Reach 6, cyanide, under Category 3A.	After discussing the comment with Regional Board staff, cyanide will remain prioritized under Category 2 because cyanide has been observed as exceeding applicable water quality objectives in Reach 6, and is prioritized as an “other receiving water consideration” per Permit Provision 5.a.iv.2.a.
6	In Table 5-1 of the EWMP under Industrial/Commercial Facilities, clarify how the determination is made on what facilities will be targeted (e.g. initial evaluation of facilities based on SIC codes or potential sources of priority pollutants). Additionally, for facilities determined to be potential sources of pollutants, provide criteria for re-inspection frequency.	Clarifying language was added to Table 5-1 to explain how the determination is made, and to provide criteria for re-inspection.
7	Correct typographical error in Table 6-3 footnote 3 on 2nd line to say “30-day average” not “3-day” average.	The correction was made.
8	In Appendix C10 Section 4.4, state that although this EWMP uses an example waterbody in Upper San Gabriel River to demonstrate BMP effectiveness, the EWMP will be revised during adaptive management to demonstrate BMP effectiveness using a water body within the Upper Santa Clara River watershed.	The statement was added to Appendix C10 Section 4.4.
9	In Appendix C10 (or maybe another section where it might be relevant), state that additional discussion and data will be added in the RAA to improve model calibration for runoff volume during adaptive management when additional monitoring data becomes available.	The statement was added to Appendix C10.
10	Check all tables for consistency.	The tables were checked for consistency.